

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11193-NG

SHAWN DRUMGOLD,)
Plaintiff)
)
v.)
)
TIMOTHY CALLAHAN, et. al.,)
Defendants)
)

DEFENDANTS CITY OF BOSTON AND FRANCIS M. ROACHE'S
MANDATORY DISCLOSURE PURSUANT TO FED.R.CIV.P. 26(a)
AND LOCAL RULE 26.2

(a)(1)(A) Individuals With Discoverable Information

Francis M. Roache
Boston Police Department

John Dailey
Boston Police Department

Paul Evans
Boston Police Department

Edward McNelley
Boston Police Department

Joseph Dunford
Boston Police Department

Joseph Saia
Boston Police Department

Daniel Coleman
Boston Police Department

Robert Dunford
Boston Police Department

Ann Marie Doherty
Boston Police Department

James Jordan
Boston Police Department

Jennifer W. Maconochie
Boston Police Department

Daniel Keeler
Boston Police Department

William Mahoney
Boston Police Department

Peter O'Malley
Boston Police Department

William Dunn
Boston Police Department

Robert Francis
Boston Police Department

Robert Ahearn
Boston Police Department

William McCarthy
Boston Police Department

Lorraine Henshaw
Boston Police Department

Trent Holland
Boston Police Department

Wilbur Brittle
Boston Police Department

Thomas Miller
Boston Police Department

Robin DeMarco
Boston Police Department

Marie Donohue
Boston Police Department

Miller Thomas
Boston Police Department

Michael D. Stratton
Boston Police Department

Justina Mitchell
Boston Police Department

James Claiborne
Boston Police Department

Paul Joyce
Boston Police Department

Pervis Ryan
Boston Police Department

William Hussey
Boston Police Department

Herbert Spellman
Boston Police Department

The defendants hereby incorporate by reference the list of witnesses produced by the other defendants, Paul Murphy, Timothy Callahan and Richard Walsh, in their respective mandatory disclosures.

The defendants reserve their rights to amend and supplement this list throughout the discovery period in this case.

(a)(1)(B) Documentation

- A. Documents regarding the investigation, initial trial, habeas corpus proceedings and motion for new trial of Shawn Drumgold in the custody, possession and/or control of the City of Boston;
- B. Documents regarding the investigation and trials of Donnell Johnson in the custody, possession and/or control of the City of Boston;
- C. Documents regarding the investigation of William Bennett relative to the homicide of Carol Stuart in the custody, possession and/or control of the City of Boston;
- D. Documents regarding the investigation and trial of Christopher Harding in the custody, possession and/or control of the City of Boston;

E. Documents regarding the investigation and trial Marvin Mitchell in the custody, possession and/or control of the City of Boston.

The defendants reserve their rights to amend and supplement this list throughout the discovery period in this case.

(a)(1)(C) Computation of Damages

The defendants do not have any insurance which would extend coverage to the allegations contained in the plaintiff's complaint.

(a)(1)(D) Insurance Coverage

Not applicable to defendants.

The defendants reserve their rights to amend and supplement this list throughout the discovery period in this case.

Respectfully submitted,
By Defendants City of Boston and
Francis M. Roache
Through their attorneys,

/s/ John P. Roache
John P. Roache (BBO# 421680)
Patrick J. Donnelly (BBO# 651113)
Hogan, Roache & Malone
66 Long Wharf
Boston, Massachusetts 02110
Tel.: (617) 367-0330

Date: December 5, 2005

CERTIFICATE OF SERVICE

I, John P. Roache, hereby certify that on this 5th day of December, 2005, I have served a copy of the foregoing DEFENDANTS CITY OF BOSTON AND FRANCIS M. ROACHE'S MANDATORY DISCLOSURE PURSUANT TO FED.R.CIV.P. 26(a) AND LOCAL RULE 26.2, where unable to do so electronically, via U.S. first class mail, postage prepaid, as follows:

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Boston, Massachusetts 02201

//s// John P. Roache
John P. Roache (BBO# 421680)